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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER PRIVACY USER PROFILE LITIGATION,

This document relates to:  
  
ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**SUPPLEMENTAL DECLARATION OF  
DEBORAH STEIN IN SUPPORT OF  
FACEBOOK, INC.'S SUPPLEMENTAL  
STATEMENT IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIALS  
SHOULD BE SEALED**

I, Deborah Stein, hereby declare as follows:

1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bars of California and New York. I submit this supplemental declaration in support of Facebook’s Supplemental Statement in Support of Plaintiffs’ Administrative Motion to Consider Whether Another Party’s Materials Should Be Sealed. I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. Attached as **Exhibit 31-A** is a true and correct **unredacted** copy of Plaintiffs’ Exhibit 31.

3. Attached as **Exhibit 31-B** is a true and correct **redacted** copy of Plaintiffs’ Exhibit 31.

4. Facebook proposes redacting confidential information regarding its data systems and Facebook’s proprietary data storage and processing practices.<sup>1</sup> How Facebook stores, manages, tracks,

<sup>1</sup> Ex. 31 at 69:5-6, 108:1-12, 113:13-23, 114:24-115:1, 129:9-25, 130:2-3, 155:15-18, 159:15-160:1, 160:14-20, 160:23-161:9, 161:13-25, 162:3-22, 163:3-7, 164:9-165:17, 165:23-166:14, 167:3-15, 167:23-168:1, 168:14-19, 169:12-23, 260:7-9, 260:11-24, 267:3-13, 269:5-7, 269:12-24, 270:1-3, 270:19-21, 273:4-7; Ex. 95 at 69:13, 69:19, 69:23, 70:12-13, 72:21, 73:18, 73:20, 75:10, 75:19, 77:17, 79:6-7, 79:12, 79:16, 82:25, 83:23, 83:25, 84:5, 84:7, 93:24-94:1, 96:21-22, 96:25, 97:2, 97:9-10, 126:8-9, 154:21, 156:7, 158:12, 158:14, 161:2, 161:6, 163:24, 165:16, 168:18, 168:24, 173:3, 178:21, 184:6; Ex. 98 at 98:19-20, 98:22, 99:3, 100:3, 100:13, 100:16-17, 100:22, 100:24, 101:10, 143:13-14, 143:19, 144:4, 351:3-5, 351:7-19, 351:23-352:5, 356:4, 357:9-10, 357:12, 357:18, 357:22, 357:25, 359:23-24, 360:7-9, 360:13; Ex. 103 at 25:22-23, 34:14-15, 34:23-24, 35:2-3, 35:15, 35:17, 36:2-3, 36:8-16, 36:18, 36:21-22, 37:2-4, 37:6, 37:8-10, 37:17, 37:20-21, 40:13-14, 40:16-21, 41:4-9, 48:4-7, 48:17-19, 52:18, 52:20-22, 53:4-9, 53:13-16, 53:21, 54:4-6, 54:14, 57:2-4, 57:7-10, 57:13, 57:16, 57:20-24, 58:14-16, 58:25, 59:1-2, 59:22-23, 60:2-8, 60:15-19, 61:2-7, 62:2-5, 62:10-19, 65:25, 67:8-10, 67:19-22, 67:25, 68:1-6, 68:8-10, 68:17-25, 70:17-20, 70:24-25, 71:2-5, 71:9-11, 71:15-16, 71:21-22, 72:16-23, 73:4-10, 74:6, 74:14-15, 74:18-22, 74:25, 75:10-22, 75:25, 76:2-7, 76:12, 76:19, 76:22-23, 78:11, 78:14-19, 79:1-2, 79:4, 79:23-25, 80:1-2, 80:16-17, 80:19-20, 81:9-10, 82:5-7, 83:4-5, 84:9, 85:12, 85:14, 85:17, 85:24, 86:11, 87:20, 93:12-15, 93:20-21, 95:19-20, 97:3-4, 97:6, 97:10-11, 98:13, 99:2, 99:6-7, 99:9-10, 99:17-18, 99:25, 100:1-4, 100:12, 100:14-17, 101:8-9, 101:11-12, 101:18-20, 102:4, 102:8-10, 102:25, 103:13, 103:19, 105:16, 108:7-10, 108:17-18, 108:24, 109:1-3, 109:5-6, 111:9-10, 111:22-25, 112:4, 112:6-8, 112:11, 112:21, 113:5-7, 113:9-11, 113:19, 113:23-24, 114:16, 114:19-21, 115:1, 115:7-8, 115:25, 116:1, 116:9-18, 131:24, 132:5-7, 132:10, 132:25, 133:1-2, 134:20-21, 136:25, 137:1-3, 137:6-7, 137:18-19, 137:25, 138:1-6, 139:12, 139:17, 139:19-25, 140:1, 140:5-11, 140:23, 141:1-5, 141:7-13, 141:15-25, 142:1-8, 142:10, 142:12-14, 142:16-17, 142:19, 142:21-22, 143:6-9, 144:10, 144:12-14, 158:14, 158:19, 159:2-8, 159:22, 160:19-20, 160:22, 164:22-24, 165:1, 165:7-11, 165:13, 165:15-16, 165:24, 166:3, 166:12, 166:16-18, 166:24-25, 167:1, 167:4-5, 167:14-15, 167:18, 167:22-23, 167:25, 168:5, 168:18-19, 168:22, 169:2-3, 169:6, 169:8-9, 169:13-17, 170:17-21, 170:23, 171:5, 171:8, 171:19-20, 172:3, 172:7, 173:4, 173:6-7, 173:10, 173:14, 173:20-24, 174:21-

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preserves, deletes, and processes data for billions of users across its data systems are key components of its business that set it apart and ahead of its competitors. I understand that, if publicly disclosed, Facebook's competitors could take advantage of this information to improve their own methods for managing high volumes of user data or for tracking and storing user data across data systems, to Facebook's competitive disadvantage. Hackers and other bad actors also could use this information to better understand Facebook's data systems and target specific repositories of data, potentially harming both Facebook and its users.

5. Facebook proposes redacting confidential information regarding its tool for responding to law-enforcement requests for user records, including the name of the tool, the types of data it contains, the delta between the data within the tool and DYI, and the format in which data from the tool is produced.<sup>2</sup> I understand that public disclosure of details about this tool would reveal confidential information regarding Facebook's internal operations that could be used by bad actors to attempt to circumvent and evade Facebook's enforcement strategies and current and future lawful governmental criminal investigations. I further understand that public disclosure of Facebook's internal processes related to the tool could provide confidential information to competitors about how Facebook tracks and stores data across its systems, to Facebook's competitive disadvantage.

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6. Facebook proposes redacting confidential and competitively sensitive information regarding its business programs, strategies, decisions, and partners, including confidential technical details of how Facebook develops and uses data to target advertisements to the most relevant users.<sup>3</sup> This

<sup>3</sup> Ex. 5 at 255:8, 258:14-15; Ex. 31 at 61:10-21, 65:12-14, 65:17-66:5, 66:19-23, 66:25-67:11, 69:11-13, 69:16-20, 69:22-25, 70:1-12, 70:20-25, 79:17-78:2, 80:20-81:19, 82:17-19, 83:24-84:1, 85:7-10, 85:13, 85:16-19, 86:9-10, 86:13-22, 88:24-89:2, 89:4-6, 89:8-13, 90:2-3, 90:5-11, 90:20-21, 90:23, 91:1-4, 91:8-10, 91:14, 91:24, 92:2-4, 92:14-16, 92:22-23, 97:3-5, 106:20-107:11, 107:15-16, 107:19-21, 107:22-24, 116:17-25, 130:21-24, 131:21-23, 132:1-4, 132:6-8, 132:19-21, 132:24-25, 144:8-9, 144:12-15, 144:20, 144:22-145:2, 149:4-6, 149:10-12, 152:8-13, 152:15-19, 152:25-153:2, 154:20-22, 154:24-155:3, 179:21-23, 179:25-180:4, 180:6-16, 180:22-25, 182:19-21, 182:23-183:17, 188:14-20, 198:17-199:8, 201:6-14, 210:11-212:6, 217:14-19, 217:21-24, 218:2-5, 218:8-12, 218:16-220:13, 221:7-222:9, 223:3-17, 223:21-224:20, 224:24-25, 225:2-12, 225:14-226:2, 226:4-15, 229:3-15, 231:1-6, 232:1-4, 232:8-10, 232:15-17, 234:2-14, 237:3-5, 237:7-10, 239:3-25, 240:1-25, 241:2-8, 243:22-24, 244:2-4, 244:7-9, 244:11-14, 244:17-18, 244:20-23, 245:1-246:6, 246:8, 246:10-15, 246:17-18, 246:20, 246:22-25, 247:2-9, 247:12-14, 247:18-21, 248:1-4, 248:6-9, 248:11-13, 248:17-19, 248:21-23, 248:25-249:5, 249:7-20, 249:22, 249:24-25, 259:1-2, 259:7-260:4, 263:7-9, 263:12-14, 263:16-264:21; Ex. 98 at 79:6-8, 79:11-12, 79:14-15, 79:19-80:5, 80:10-12, 98:2-4, 98:7-12, 157:25-158:14, 172:12-16; Ex. 103 at 69:5-8, 69:13-17, 69:25, 70:1, 70:3-7, 70:13-14, 190:16, 190:25, 191:1-2, 212:14-15; Ex. 105 at 62:16-17, 19-22, 25, 63:1-2, 93:16, 18, 94:11, 19, 21, 95:8, 11-12, 17, 19, 96:5, 10, 20, 100:8-9, 126:8-12, 130:11, 14, 131:4, 7, 132:6-8, 12, 16-17, 19-20, 24, 237:21-24, 238:18, 252:15-16, 253:6-7, 266:11-13, 18-20, 268:2-3, 20-23, 269:2-6, 270:1-2, 273:5-8, 14-15, 274:22, 275:12, 277:11-17, 281:25, 282:1-6, 302:3, 303:8-9, 312:9, 314:19-20, 315:3-4, 13-14, 25, 318:4, 319:21-22, 322:10, 338:7-11, 18, 25, 339:1-2, 10-12, 344:20-21, 358:8-10, 360:16, 369:7-8, 22-23, 550:13, 561:9-10, 15-16, 563:24-25, 583:10, 584:18, 23, 586:24, 587:8, 588:22-23, 589:1, 604:17-21, 605:7-10, 23, 606:14-15, 18, 610:1, 660:16-19, 663:9-10, 14-17, 20-24, 664:11, 19-20, 23-25, 665:1-2, 5, 19, 666:11, 17, 21, 667:2-3, 10-11, 673:5-6, 685:11-14, 688:11-12, 15, 18, 709:11-12, 711:11, 16-18, 712:2-3, 5-6, 8, 12, 896:2-4, 6-11, 13, 914:10-15, 1000:7-8, 10-11, 14, 1040:3, 8-10, 12-13, 16-18, 20, 1041:2, 6, 16, 18-21, 24-25, 1042:1, 3, 7-8, 10, 12, 17, 21-24, 1081:1-4, 6-7, 11, 14-15, 21-23, 1086:4, 7-9, 13-14, 18, 23-25, 1148:7, 1190:13, 18, 1191:1, 21-22, 25, 1192:1, 6, 10, 15-16, 20, 1193:3, 5, 10, 19; Ex. 106 at 6:15-16, 6:18, 6:21-22, 7:8-9, 7:12, 7:14-15, 7:21-22, 7:24-25, 8:8-9, 8:12-13, 8:16-17, 8:23, 9:5-7, 22:6, 23:3, 23:6, 23:8-18, 24:12-15, 25:15-23, 29:21-30:2, 39:8-11, 41:5, 41:7, 41:11-12, 41:17-25, 42:4-11, 42:20, 42:22-24, 43:3-5, 43:9-11, 43:14-15, 43:17-19, 43:21-23, 43:25-44:2, 44:4-5, 44:8-10, 45:23-46:8, 46:10-12, 50:10-14, 51:9-23, 52:16-21, 54:12-16, 55:21-23, 59:22-23, 60:3-5, 60:7, 60:9-10, 60:12, 60:14-16, 60:18-19, 60:21-22, 60:23-61:6, 61:8-9, 73:3-4, 73:6, 73:8-13, 73:16-17, 73:20, 73:24, 74:6-9, 74:12-13, 74:17-20, 74:22-75:1, 75:3, 75:12-22, 76:4-5, 76:17-18, 76:21, 77:3-4, 77:6-8, 77:17-20, 77:24-25, 78:5-6, 78:11-23, 79:1, 79:3-9, 79:14-15, 79:20-22, 79:24-80:1, 80:5, 80:11-13, 80:16, 80:21-22, 81:3-5, 81:21, 81:24-82:3, 82:9-14, 82:18, 82:21-22, 82:24-83:3, 83:9-11, 83:14-17, 84:1-2, 84:4-10, 84:20, 84:24-24, 85:2-11, 85:13-19, 85:24-25, 88:4, 88:6, 88:10, 89:11, 89:14, 89:20, 89:22, 90:1-6, 90:10-19, 90:23, 91:2, 91:4-10, 91:14-17, 91:2192:4, 92:7-12, 92:16-17, 92:20, 92:22-23, 92:25, 93:2-6, 93:13-23, 94:1-9, 94:13, 94:17-22, 94:24-95:2, 95:6-7, 95:13-14, 95:18-96:7, 96:11-12, 96:15-16, 96:18-21, 97:1, 97:4-5, 98:4-5, 98:7-8, 98:11-14, 98:16, 99:23-100:3, 100:5-6, 100:8, 100:14-17, 100:19-21, 100:24-25, 101:7-9, 101:15-17, 101:24, 102:1-4, 102:8-10, 102:14, 102:18, 102:12-25, 103:4-6, 103:11-13, 103:19, 103:21-22, 103:24-104:4, 104:25-105:7, 105:12-13, 105:17, 105:24-25, 106:7-8, 106:11-14, 106:21-25, 107:5-10, 107:14-15, 107:19-21, 110:2-4, 110:4, 110:6-11, 110:16-111:1, 111:3-4, 111:6-7, 111:10-11, 111:16-18, 111:20-21, 111:23-25, 112:6-7, 112:10-11, 112:13-16, 112:21, 112:24-113:1, 113:4-5, 113:10-11, 113:18-21, 113:24-25, 114:4-5, 114:8, 114:11-15, 114:23-24, 115:2-3, 115:6-7, 115:11-22, 116:18-19, 116:21-24, 117:3-4, 117:14-17, 117:25-118:3, 118:8-11, 118:13-14, 118:17-19, 119:1-3, 119:18-20, 122:10-11, 122:23, 122:25-123:1, 123:14, 123:17-19,



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information also includes confidential strategic discussions regarding Facebook's existing and potential future business models and strategies, as well as confidential information regarding the identities of and negotiations with entities with which I understand Facebook has a business relationship. I am informed and believe that, if publicly disclosed, this information could harm Facebook's relationships with these entities and undercut Facebook's ability to negotiate with competitors of these entities. I am further informed and believe that public disclosure of confidential information regarding Facebook's business models could allow Facebook's competitors to use this information developed at Facebook's expense to improve or develop their own competing techniques, to Facebook's competitive disadvantage. Additionally, I am informed and believe that public disclosure of confidential information regarding Facebook's business strategies could allow Facebook's competitors to copy these strategies, developed at Facebook's expense, to more effectively compete with Facebook. Finally, Facebook's ability to serve advertisements to its users effectively is an essential aspect of its business and I am informed and believe that, if publicly disclosed, this information could allow Facebook's competitors to improve their serve of advertisements to Facebook's competitive disadvantage.

7. Facebook proposes to seal confidential information regarding Facebook's privacy and platform policy enforcement practices, including Facebook's decision-making process for evaluating apps and developers that may be violating its policies.<sup>4</sup> I understand that public disclosure of details

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<sup>4</sup> Ex. 5 at 265:24-266:10, 267:5-13, 312:13-20, 314:6-13; Ex. 31 at 129:9-25, 130:2-3, 133:9-10, 133:12, 133:16-17, 133:20-22, 133:24, 134:3-5, 134:8-10, 134:12-13, 148:10-16, 197:12-16; Ex. 103 at 19:4-5, 19:7-8, 19:14-15; Ex. 105 at 76:4-7, 78:5-7, 10-12, 14-15, 17-19, 22, 79:1, 3, 80:12-13, 81:20-21, 24-25, 82:1, 116:18, 117:4-6, 10-12, 20, 24-25, 120:18, 226:11-12, 296:13-14, 19, 297:2, 12, 573:9-10, 12, 14-16, 576:18-19, 21, 579:17-18, 608:19-20, 609:18, 25, 611:1-3, 6-8, 10, 12-15, 19-20, 25, 612:1, 616:18-19, 21-22, 617:9-10, 15-20, 618:3, 619:6-7, 12, 14, 620:20, 621:3-4, 7-9, 11-13, 18, 622:11-15, 623:11-13, 20-22, 629:13, 15, 637:14-16, 21-25, 638:4-5, 7-8, 10-11, 639:22-23, 640:2-4, 7-8, 642:15-17, 21-23, 643:5-7, 10, 12-13, 644:2, 11-12, 645:4-5, 14-15, 17, 646:16-18, 648:4-5, 16-17, 649:13-14, 25, 650:1-3, 8-9, 19-22, 654:10-11, 23-24, 656:10-11, 19-21, 657:3-4, 658:17-18, 798:15-17, 19-21, 801:7-13, 15, 18-20, 21-22, 24-25, 802:1-2, 5-9, 13-16, 18, 24-25, 803:1-2, 5-6, 8-9, 13-16, 19, 804:1-5, 8-10, 14-15, 19, 22-25, 805:2-4, 6-14, 18, 23, 806:1-3, 18-20, 807:6-7, 11-12, 23, 808:2-3, 11, 14-16, 20-21, 809:6-10, 17-20, 811:5-8, 11-12, 14-15, 812:1-4, 7, 15-21, 23, 25, 813:1-3, 5-8, 10-11, 14, 23, 814:2-3, 10-12, 15-17, 815:18-21, 25, 816:1-5, 9-12, 20-23, 817:2-3, 8-9, 14-15,

1 regarding Facebook's policy-enforcement efforts would reveal confidential information regarding Fa-  
 2 cebook's internal operations that could be used by bad actors to attempt to circumvent and evade Fa-  
 3 cebook's enforcement strategies, potentially harming Facebook and its users.

4  
 5 8. Facebook proposes to seal confidential information regarding Facebook's response to  
 6 ongoing regulatory matters.<sup>5</sup> I understand that public disclosure of details regarding these matters  
 7 would reveal confidential information Facebook's internal strategy for responding to regulatory inquir-  
 8 ies from state and federal agencies.

9  
 10 I declare under penalty of perjury under the laws of the United States of America that the fore-  
 11 going is true and correct.

12  
 13 Executed on September 14, 2022 in Los Angeles, California.

14  
 15 /s/ Deborah Stein

16 Deborah Stein

17  
 18  
 19  
 20 19-20, 819:4-5, 9-10, 14, 820:4-6, 16-19, 823:1-4, 7-8, 15-23, 25, 824:1-2, 15-16, 825:9-11, 16-17, 24-  
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